

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC.,<sup>1</sup>

Reorganized Debtor.

Chapter 11

Case No. 24-12480 (LSS)

(Jointly Administered)

**Hearing Date:**

**November 18, 2025 at 10:00 a.m. (ET)**

**Objection Deadline:**

**October 14, 2025 at 4:00 p.m. (ET)**

**NOTICE OF LITIGATION TRUSTEE'S FIRST OMNIBUS OBJECTION  
(NON-SUBSTANTIVE) TO CERTAIN AMENDED, SUPERSEDED OR  
DUPLICATE CLAIMS**

**CLAIMANTS RECEIVING THIS NOTICE SHOULD REVIEW  
THE SCHEDULES TO THE PROPOSED ORDER ATTACHED  
TO THE OBJECTION FOR THEIR NAMES AND CLAIMS.**

**PLEASE TAKE NOTICE** that Lawrence R. Hirsh, Litigation Trustee of the Litigation Trust, has filed the *Litigation Trustee's First Omnibus Objection (Non-Substantive) to Certain Amended, Superseded or Duplicate Claims* (the "**Objection**"), a copy of which is attached.<sup>2</sup> **YOUR CLAIM MAY BE DISALLOWED AND YOUR RIGHTS MAY BE ADVERSELY AFFECTED BY THE OBJECTION. THEREFORE, YOU SHOULD REVIEW THE OBJECTION AND ITS EXHIBITS CAREFULLY.**

**PLEASE TAKE FURTHER NOTICE** that any objections or other responses to the Objection must be in writing, conform with all applicable rules, and be filed with the United States Bankruptcy Court for the District of Delaware (the "**Court**") on or before **October 14, 2025 at 4:00 p.m. (ET)**.

---

<sup>1</sup> The last four digits of Franchise Group, Inc.'s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. In addition to the foregoing Reorganized Debtor, the "Reorganized Debtors" include certain affiliated entities, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FRG/>. All motions, contested matters, and adversary proceedings that remained open as of the closing of such cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS). On June 6, 2025, all of the Debtors with the exception of Freedom VCM Holdings, LLC ("**TopCo**") emerged from the chapter 11 cases as Reorganized Debtors [D.I. 1605]. TopCo emerged from the chapter 11 cases as a Reorganized Debtor on July 3, 2025 [D.I. 1689].

<sup>2</sup> Capitalized terms used and not defined in this Notice have the meaning ascribed in the Objection.

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider the Objection will be held on **November 18, 2025 at 10:00 a.m. (ET)** before the Honorable Laurie Selber Silverstein, United States Bankruptcy Judge, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: September 19, 2025  
Wilmington, Delaware

**RAINES FELDMAN LITTRELL LLP**

/s/ Mark W. Eckard

Thomas J. Francella, Jr. (No. 3835)  
Mark W. Eckard (No. 4542)  
824 North Market Street, Suite 805  
Wilmington, DE 19801  
Telephone: (302) 772-5803  
Email: tfrancella@raineslaw.com  
meckard@raineslaw.com

- and -

Hamid R. Rafatjoo (*pro hac vice*)  
4675 MacArthur Court, Suite 1550  
Newport Beach, CA 92660  
Telephone: (310) 440-4100  
Email: hrafatjoo@raineslaw.com

- and -

David S. Forsh (*pro hac vice*)  
1350 Avenue of the Americas, 22nd Floor  
New York, NY 10019  
Telephone: (917) 790-7100  
Email: dforsh@raineslaw.com

*Counsel to the Litigation Trustee*